

1 MICHAEL J. SHEPARD (SBN 91281)

*mshepard@kslaw.com*

2 **KING & SPALDING LLP**

3 50 California Street, Suite 3300

4 San Francisco, California 94111

Telephone: +1 415 318 1221

5 KERRIE C. DENT (admitted *pro hac vice*)

*kdent@kslaw.com*

6 **KING & SPALDING LLP**

7 1700 Pennsylvania Avenue, NW, Suite 900

Washington, DC 20006-4707

8 Telephone: +1 202 626 2394

9 CINDY A. DIAMOND (SBN 124995)

*cindy@cadiamond.com*

10 **ATTORNEY AT LAW**

11 58 West Portal Ave #350

San Francisco, CA 94127

12 Telephone: +1 408 981 6307

13 Attorneys for Defendant

14 ROWLAND MARCUS ANDRADE

15  
16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA**

18 **SAN FRANCISCO DIVISION**

19 UNITED STATES OF AMERICA,

20 Plaintiff,

21 v.

22 ROWLAND MARCUS ANDRADE,

23 Defendant.

Case No. 3:2-cr-00249-RS

24 **STIPULATION AND PROPOSED ORDER**  
25 **TO CONTINUE DUE DATE FOR**  
26 **DEFENDANT'S RULE 29 MOTION FOR A**  
27 **JUDGMENT OF ACQUITTAL AND/OR**  
28 **RULE 33 MOTION FOR A NEW TRIAL**

Judge: Hon. Richard Seeborg, Chief Judge

Hearing Date: June 17, 2025

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

Prior to filing any such motions, Mr. Andrade respectfully requests an opportunity to review the transcripts from the trial in this matter and, by extension, to continue the due date for these motions. Mr. Andrade's counsel has communicated with government counsel regarding this matter, who has no objection to continuing the due date for any Rule 29 motion (even after verdict) or Rule 33 motion. Accordingly, the parties respectfully request and stipulate that the Court continue the due date for any Rule 29 or Rule 33 motions to May 23, 2025, and propose the following briefing schedule:

The parties agree that any and all Rule 29 and Rule 33 motions are timely filed if made according to this schedule, or in compliance with any additional extensions the Court may grant.

March 13, 2025

2

1 By: /s/ Michael J. Shepard  
MICHAEL J. SHEPARD  
2 KERRIE C. DENT  
CINDY A. DIAMOND

3 Attorneys for Defendant  
4 ROWLAND MARCUS ANDRADE

5  
6 PATRICK D. ROBBINS  
Acting United States Attorney

7 /s/ Christiaan H. Highsmith  
8 CHRISTIAAN H. HIGHSMITH  
9 DAVID J. WARD  
Assistant United States Attorneys

10 MATTHEW CHOU  
11 Special Assistant United States Attorney

12 Attorneys for the United States of America  
13  
14  
15  
16  
17

18 **[PROPOSED] ORDER**

19 The schedule as set forth in the Stipulation of the parties for the defendant's Motion for  
20 New Trial and/or Judgment of Acquittal, is adopted and ordered.

21 DATED: \_\_\_\_\_

22 \_\_\_\_\_  
Hon. RICHARD SEEBORG  
23 Judge of the United States District Court  
24  
25  
26  
27  
28